

# Exhibit C

To: Agency Employees and Contractors  
U.S. Department of Transportation

From: Brian C. Kipnis, Rebecca S. Cohen, Sarah L. Bishop  
U.S. Attorney's Office for the Western District of Washington

Date: August 14, 2025

Re: Notice of Court Order, *King County v. Turner*, 2:25-cv-814-BJR (W.D. Wash.)

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### NOTICE OF COURT ORDER

At the direction of the United States District Court for the Western District of Washington, you are hereby advised that a new preliminary injunction order has been entered in the case of *King County v. Turner*, 2:25-cv-814-BJR (W.D. Wash.), ECF No. 338 (Aug. 12, 2025). The Court has directed that notice of the order be provided to "all Defendants and their employees by the end of the second day after [its] issuance." A copy of the Court's order is enclosed for reference. You should review the injunction issued by the Court for its full terms. But to assist in your compliance, we provide a summary in this notice.

As relevant to you, the order enjoins enforcement of certain terms incorporated into Fiscal Years 2024 and 2025 grant agreements awarded to certain plaintiffs by the U.S. Department of Transportation and its operating divisions and agencies (together, "DOT"). Lists of the relevant plaintiffs (the "New DOT Plaintiffs") and grant terms (the "Enjoined Terms") can be found at the end of this notice.

Under the Court's order:

1. DOT is enjoined from:
  - a) imposing or enforcing the Enjoined Terms at any stage of the grantmaking process, with respect to any DOT funds awarded, directly or indirectly, to the New DOT Plaintiffs;
  - b) as to the New DOT Plaintiffs, rescinding, withholding, cancelling, or otherwise not processing any grant agreements, or pausing, freezing, impeding, blocking, cancelling, terminating, delaying, withholding, or conditioning grant funds, based on the Enjoined Terms, including without limitation failing or refusing to process and otherwise implement grants signed with changes or other objections to the Enjoined Terms;
  - c) requiring the New DOT Plaintiffs to make any "certification" or other representation related to compliance with the Enjoined Terms;

- d) retroactively applying the Enjoined Terms to any New DOT Plaintiffs' grant agreements during the effective period of this injunction—*i.e.*, from August 12, 2025, onwards; or
  - e) refusing to issue, process, or sign grant agreements based on New DOT Plaintiffs' participation in this lawsuit.
2. Further, DOT shall treat as null, void, and rescinded:
- a) any actions already taken to implement or enforce the Enjoined Terms as to the New DOT Plaintiffs, including any delays or withholding of funds based on the Enjoined Terms;
  - b) any of the Enjoined Terms included in any grant agreement executed by any New DOT Plaintiff during the effective period of this injunction, *i.e.*, from August 12, 2025, onwards.
3. Lastly, DOT shall immediately take every step necessary to effectuate this order, including clearing any administrative, operational, or technical hurdles to implementation.

As the Court's order reflects, the injunction is temporary, as litigation in the case is ongoing. But the Court's order is in effect and must be complied with until further notice.

If you have any questions about the scope or effect of the Court's order, please contact Erin Hendrixson in DOT's Office of General Counsel at [erin.hendrixson@dot.gov](mailto:erin.hendrixson@dot.gov) or 202-430-3861. Thank you for your attention to this matter.

**THE NEW DOT PLAINTIFFS**

**Important:** the relevant plaintiffs include both the entities listed below *and* their subrecipients.

California:

Alameda County  
City of Healdsburg  
City of Los Angeles  
City of Oakland  
City of Pacifica  
City of Pasadena  
City of Petaluma  
City of Rohnert Park  
City of San Diego  
San Mateo County  
City of Santa Rosa  
Sonoma County Transportation Authority  
City of Watsonville

Maryland:

Mayor and City Council of Baltimore

Massachusetts:

City of Cambridge

Minnesota:

Hennepin County  
Ramsey County

New Mexico:

City of Albuquerque

New York:

City of Rochester

Oregon:

City of Eugene  
Multnomah County

Washington:

City of Bellevue  
City of Bellingham  
City of Bremerton  
Kitsap County  
Puget Sound Regional Council

Wisconsin:

Dane County  
Milwaukee (City & County)

### THE ENJOINED TERMS

**Important:** (1) this list of terms is similar to but *not* the same as the terms enjoined in prior orders issued in this lawsuit; (2) the enjoined terms include both the terms listed below *and* any materially similar terms or conditions.

- Pursuant to section (3)(b)(iv)(A), Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, the recipient or applicant agrees that its compliance in all respects with all applicable Federal antidiscrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code;
- Pursuant to section (3)(b)(iv)(B), Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, by entering into this Agreement, the recipient or applicant certifies that it does not operate any programs promoting diversity, equity, and inclusion ("DEI") initiatives that violate any applicable Federal anti-discrimination laws;
- The recipient or applicant agrees to comply with executive orders, including but not limited to Executive Order 14168 titled Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, as they relate to the application, acceptance, and use of Federal funds for this project or grant;
- The recipient or applicant will cooperate with Federal officials in the enforcement of Federal law, including cooperating with and not impeding U.S. Immigration and Customs Enforcement ("ICE") and other Federal offices and components of the Department of Homeland Security in the enforcement of Federal immigration law;
- The recipient or applicant will follow applicable federal laws pertaining to Subchapter 12, and be subject to the penalties set forth in 8 U.S.C. § 1324, Bringing in and harboring certain aliens, and 8 U.S.C. § 1327, Aiding or assisting certain aliens to enter.
- The recipient or applicant must comply with other applicable federal nondiscrimination laws, regulations, and requirements, and follow federal guidance prohibiting discrimination;
- The recipient or applicant must comply with all applicable executive orders as they relate to the application, acceptance, and use of Federal funds for this Project;
- Performance under this agreement or application shall be governed by and in compliance with the following requirements, as applicable, to the type of organization of the recipient or applicant and any applicable sub-recipients. The applicable provisions to this agreement or application include, but are not limited to, the following: Bringing in and harboring certain aliens – 8 U.S.C. 1324; Aiding or assisting certain aliens to enter – 8 U.S.C. 1327; Executive Order 14151, Ending Radical and Wasteful Government DEI Programs and Preferencing; Executive Order 14168 Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government; and Executive Order 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity.